### UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF GEORGIA MACON DIVISION

PING WANG, EMILY LEHNES, EMILY RAMOS, JENNIFER KILKUS, and JOHN DOE, individually and on behalf of all others similarly situated,

Plaintiffs.

v.

THE CORPORATION OF MERCER UNIVERSITY,

Defendant.

Case No. 5:23-cv-00193-TES

# PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

Under Federal Rule of Civil Procedure 23(e), Plaintiffs Ping Wang, Emily Lehnes, Emily Ramos, Jennifer Kilkus, and John Doe (collectively, "Plaintiffs") respectfully move this Court, pursuant to Federal Rule of Civil Procedure 23, for an Order: (i) granting final approval of the proposed Settlement; (ii) certifying the class for purposes of Settlement; and (iii) entering Judgment and dismissing all claims.

This Motion is based on (i) the Memorandum of Law in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement and its exhibits (filed concurrently herewith); (ii) all prior pleadings and proceedings had herein; (iii) arguments of counsel; and (iv) any other matters properly before the Court.

For the reasons described in Plaintiffs' Memorandum of Law in support of this Motion,

Plaintiffs respectfully request that this Court grant the Motion and enter the proposed Order.

DATED: April 3, 2025 Respectfully submitted,

/s/ William B. Federman

William B. Federman (admitted *pro hac vice*)

#### FEDERAMN & SHERWOOD

10205 N. Pennsylvania Ave.
Oklahoma City, OK 73120
-and4131 North Central Expressway, Suite 900
Dallas, Texas 75204
T: (405) 235-1560
wbf@federmanlaw.com

#### LAUKAITIS LAW LLC

Kevin Laukaitis\*
954 Avenida Ponce De Leon
Suite 205, #10518
San Juan, PR 00907
T: (215) 789-4462
klaukaitis@laukaitislaw.com

Interim Co-Lead Class Counsel

Brian P. Adams
Georgia Bar No. 142474
Mary Beth Hand
Georgia Bar No. 322826
ADAMS LAW FIRM
598 D.T. Walton Sr. Way
Macon, GA 31201
T: (478) 238-0231
brian@brianadamslaw.com
mbhand@brianadamslaw.com

Liaison Counsel for Plaintiffs and the Class

#### **MURPHY LAW FIRM**

A. Brooke Murphy (admitted *pro hac vice*) 4116 Will Rogers Pkwy., Suite 700

Oklahoma City, OK 73108 T: (405) 389-4989 abm@murphylegalfirm.com

#### **REESE LLP**

Michael R. Reese 100 West 93rd Street, 16th Floor New York, NY 10025 T: (212) 643-0500 F: (212) 253-4272

#### **TURKE & STRAUSS LLP**

Samuel J. Strauss Raina Borrelli\* 613 Williamson St., #201 Madison, WI 53703 T: (608) 237-1775 sam@turkestrauss.com raina@turkestruass.com

## MILBERG COLEMAN BRYSON PHILLIPS GROSSMAN, PLLC

David K. Lietz 5335 Wisconsin Avenue NW Washington, DC 20015-2052 T: (866) 252-0878 F: (202) 686-2877 dlietz@milberg.com

## KOPELOWITZ OSTROW FERGUSON WEISELBERG GILBERT

Kenneth J. Grunfeld\* 65 Overhill Road Bala Cynwyd, PA 19044 T: (954) 525-4100 grunfeld@kolawyers.com

Additional Attorneys for Plaintiffs and the Class

\*pro hac vice forthcoming

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 3, 2025, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using CM/ECF. Copies of the foregoing document will be served upon counsel via transmission of Notices of Electronic Filing generated by CM/ECF.

<u>/s/ William B. Federman</u> William B. Federman